



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

*271 Cadman Plaza East
Brooklyn, New York 11201*

F. #2016R02185

January 2, 2020

By FedEx and ECF

Anthony Ricco
20 Vesey Street, Suite 400
New York, New York 10007

Re: United States v. Donville Inniss
Criminal Docket No. 18-134 (S-2)(KAM)

Dear Mr. Ricco:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the government hereby furnishes the following additional discovery with respect to the above-referenced matter. This submission supplements the government's earlier disclosures to you. With this production, the government renews its request for reciprocal discovery from the defendant.

Enclosed with this letter is a disc that contains the following:

- Google account information relating to Co-Conspirator 1, Bates-numbered DOJ-CDL-000513888.
- The BIDC 2014-15 Annual Report, Bates-numbered DOJ-CDL-000513889-513956.
- A replacement version of the document previously produced at Bates-number DOJ-CDL-00050412. This replacement version was also provided via email on December 11, 2019.
- Florida DMV records, Bates-numbered DOJ-CDL-000513957-58.

If you have any questions or requests regarding further discovery or a disposition of this matter, please do not hesitate to contact us.

Very truly yours,

RICHARD P. DONOGHUE
United States Attorney

By: /s/ David Gopstein
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By: /s/
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Enclosure

cc: Clerk of the Court (KAM) (by ECF) (without enclosure)